

**STAFF REPORT**

Meeting Date: December 12, 2003

**Agenda Item 12**

**TO:** LAFCO Commissioners

**FROM:** Everett Millais, Executive Officer

**SUBJECT:** Municipal Service Reviews – Ojai-San Buenaventura (Ventura River Watershed) and Santa Clara River Watershed Water and Wastewater Service Area Agencies

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**RECOMMENDATIONS:**

- A. Accept the Ojai – San Buenaventura (Ventura River Watershed) Water and Wastewater Municipal Service Review Report for the 11 agencies that provide water and/or wastewater services in the Ventura River Watershed service area of Ventura County.
- B. Accept the Santa Clara River Watershed Service Review Area Water and Wastewater Municipal Service Review Report for the 10 agencies that provide water and/or wastewater services in the Santa Clara River Watershed service area of Ventura County.
- C. Adopt separate resolutions for each of the following 21 agencies making findings that the actions are exempt under the “general rule” exemption of the California Environmental Quality Act (CEQA) Guidelines (§15061(b)(3)) and approving water and/or wastewater service reviews and statements of determinations as required by Government Code §56430:

Ojai – San Buenaventura Agencies

City of San Buenaventura  
Casitas Municipal Water District  
Meiners Oaks County Water District  
Montalvo Municipal Improvement District  
Ojai Basin Groundwater Management Agency

**COMMISSIONERS AND STAFF**

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Ojai Valley Sanitary District  
Recommendation Continued

Ojai Water Conservation District  
Saticoy Sanitary District  
Ventura County Service Area No. 29  
Ventura County Service Area No. 32  
Ventura River County Water District

Santa Clara Watershed Agencies  
City of Fillmore  
City of Oxnard  
City of Port Hueneme  
City of Santa Paula  
Channel Islands Beach Community Services District  
Fox Canyon Groundwater Management Agency  
Ocean View Municipal Water District  
United Water Conservation District  
Ventura County Service Area No. 30  
Ventura County Waterworks District No. 16

- D. Direct staff to compile and format for public distribution a single municipal service review report for the 36 agencies providing public water and/or wastewater services in Ventura County, including determinations adopted by the Commission and a single Executive Summary.

**DISCUSSION:**

Background:

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code §56000 et seq.) mandates that each LAFCO conduct municipal service reviews prior to or in conjunction with Sphere of Influence (SOI) studies and updates. LAFCOs are also required to review and update the SOI for all agencies not less than once every five years.

In May 2002, after holding several public study sessions on how to best implement the municipal service review and sphere of influence update mandates, the Commission approved an overall work plan. The work plan divided the tasks into three phases. Because non-agricultural water and wastewater services were determined to be the core municipal services necessary for growth, the first phase of the process was established as a countywide review of the public water and wastewater service providers.

After budgeting for professional consulting services to prepare the water and wastewater service reviews as a part of the 2003-2003 fiscal year budget, and after a public Request for Proposals process, the Commission entered into a professional services agreement with Project Design Consultants (PDC) in December 2002 to conduct the water and wastewater service reviews. The project manager for PDC is Joyce Crosthwaite. Ms. Crosthwaite was present at the October 15 meeting to present the Final Draft of the Ojai – San Buenaventura Municipal Service Review Report. The Item was continued to the December 12, 2003 Special Meeting. Ms. Crosthwaite will be present at the December 12, 2003 meeting to present the Final Draft of the Ojai-San Buenaventura (Ventura River Watershed) Water and Wastewater Municipal Service Review Report and the Final Draft of the Santa Clara River Watershed Service Review Area Water and Wastewater Municipal Service Review Report.

### The Reports & Actions by the Commission

The Final Drafts of the Ojai-San Buenaventura (Ventura River Watershed) Water and Wastewater Municipal Service Review Report and the Santa Clara River Watershed Service Review Area Water and Wastewater Service Review Report, having a combined total of 21 water and wastewater agencies, were previously distributed to the Commission. The Reports each contain an Executive Summary and set forth proposed written determinations for each of the nine mandatory factors for each agency. These proposed determinations are repeated in each of the attached resolutions recommended for action.

Appendix A in both reports contains copies of the survey responses received from each of the agencies reviewed in the reports. Most of the 21 agencies were responsive and several provided helpful comments about the process and ways to improve the survey questions in the future. The survey responses and meetings with the individual agencies are the basis for the Reports and for the recommended determinations.

The survey questions and responses have all been entered into a large database of information. This database is a unique feature of the approach being taken for service reviews by the Ventura LAFCO. The database will enable information to be easily updated, for reports to be generated as necessary based on selected information, and provides a base-line of public information that can be used for future service reviews.

The Final Draft of the Calleguas Watershed Sub-Regional Water and Wastewater Municipal Service Review Report was considered and adopted at the regular LAFCO meeting held on September 17, 2003. Once the Commission acts on the Final Drafts of the Ojai-San Buenaventura (Ventura River Watershed) Water and Wastewater Municipal Service Review Report and the Santa Clara River Watershed Service Review Area Water

and Wastewater Service Review Report, all the Reports will be finalized. It is recommended that the reports be compiled and formatted for public distribution in a single document with a single Executive Summary, as attached.

It is important to note that the actions recommended at this time relate only to water and wastewater service reviews. Sphere of Influence updates are not part of any of the recommended actions. It is expected that once the service reviews are completed for all of the water and wastewater agencies, Sphere of Influence Update actions will be recommended early next year for all agencies that don't require significant extra special study or CEQA review.

#### CEQA:

The Ventura LAFCO is the lead agency under CEQA for the service reviews now being recommended. The Commission must therefore address CEQA requirements before taking any action. In staff's opinion it could easily be argued that the water and wastewater service review actions being recommended are not a project under CEQA in that the actions will not result in a direct or reasonably foreseeable indirect physical change in the environment. Such a determination, however, would not result in any further public CEQA notice of action and potentially could be challengeable over an extended period of time. Thus, a more conservative approach of having the Commission determine that each of the 21 recommended actions are exempt from CEQA is recommended. This will result in the filing of a Notice of Exemption with the County Clerk for each action and, significantly, a 30-day period for anyone to challenge the CEQA determinations. If no challenge to the CEQA determination is filed by the end of the 30-day period, the actions are not subject to subsequent CEQA challenge in the future.

Staff, in conjunction with legal counsel, reviewed both the CEQA Guidelines and the CEQA discussion in the newly issued State Guidelines for Municipal Service Reviews. Based on this review it is recommended that the Commission find that each of the 21 separate actions recommended are exempt from CEQA under what is referred to as the "general rule" exemption. Specifically, CEQA Guidelines §15061(b)(3) provides that a project (each individual service review) is exempt from CEQA if:

"The activity is covered by the general rule that CEQA applies only to projects, which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."

Each of the recommended resolutions contains a finding that the action is exempt from CEQA based on this "general rule" exemption.

### Public Hearing Notice:

Unlike Sphere of Influence changes, there are no special notice or public hearing requirements for actions on municipal service reviews. Notwithstanding this fact, the entire service review process is intended to be public and both the draft and newly issued final State Municipal Service Review Guidelines recommend taking action on service reviews at a noticed public hearing. Thus, the Ojai-San Buenaventura and Santa Clara Watershed Water and Wastewater Municipal Service Review Reports for water and wastewater services and the related recommended actions have been noticed and scheduled as a public hearing. Both legal and display ad notices were published in the Ventura County Star on Sunday, November 16. The notice and the Final Draft Reports were posted on the Ventura LAFCO web site. Notice of the hearing was also posted at the County Government Center. Copies of the Final Draft Reports have been distributed to all the affected agencies and to other interested agencies and individuals.

### Attachments:

1. Revised Errata information for the Ojai – San Buenaventura Report
2. Errata and Responses to Comments information for the Santa Clara Watershed Report
3. The combined Executive Summary for the Final Report

# ERRATA SHEET

## Ojai-San Buenaventura Water and Wastewater Service Review Report

Revised Nov. 10, 2003

### Ojai Valley Sanitary District Comments

1. On page 26, Table 8, Estimated 3-Month Reserves, the figures for the Ojai Valley Sanitary District have been corrected in following Revised Table 8, Estimated 3-Month Reserves

**Revised Table 8, Estimated 3-Month Reserves**

	ESTIMATED MONTHLY OPERATING EXPENSES	ESTIMATED THREE MONTH OPERATING EXPENSES	TOTAL OPERATING RESERVES	NUMBER OF MONTHS OF OPERATING RESERVES
Casitas MWD	\$1,465,154	\$488,384	\$2,987,913	6
San Buenaventura				
Meiners Oaks CWD	Expenses Not Reported	Expenses Not Reported	\$251,000*	
Montalvo MID	\$33,879	\$101,639	\$400,000	12
Ojai Basin GMA	\$2,682	\$8,047	None Reported	
Ojai Valley SD	<b>\$400,468</b>	<b>\$1,201,403</b>	<b>\$1,792,704</b>	<b>4</b>
Ojai Water CD	\$419	\$1,258	None Reported	
Saticoy SD	\$27,436	\$82,310	None Reported	0
CSA #29	\$27,436	\$82,319	\$70,000	3
CSA #32*	\$2,626	\$7,879	\$8,944	3
Ventura River CWD	\$59,984	\$179,953	\$320,000	5

2. On page 49, Determinations for the City of San Buenaventura, Financing Constraints, the correct determination is

*"No information was provided by the ~~agency~~ City".*

3. On Page 51, Determinations for the Montalvo Municipal Improvement District, Government Structure Options, the correct determination is

*"That the Montalvo MID should analyze the economic and financial impacts of reorganization with the City of San Buenaventura and the ~~Montalvo MID~~ Saticoy Sanitary District."*

4. On page 40, Government Structure Options, the first full paragraph is corrected as follows:

*"There are three ways that proposals for the reorganization of special districts can be legally submitted to LAFCO—by petition of the landowner/voters (Government Code*

Section §56864-56871), by resolution of an affected agency ((Government Code Section §56375) or by the LAFCO Commission (Government Code Section §56375). Since there has been little evidence of widespread dissatisfaction among the citizens of the Ojai Valley with current **public agency** water service providers, it is not expected that either landowners or registered voters would submit a petition to LAFCO to reorganize **public agency** water purveyors. Similarly, since 1972 there has been little effort among the water agencies to study the issue and it is again doubtful that one of the affected agencies would initiate a reorganization.

5. On page 40, Government Structure Options, the last full paragraph is corrected as follows:

*“Some of the possible government structure options that might be considered as part of a reorganization of water providers are listed below. Not all the possible government structure options have been included in the following discussion. For example, private and mutual water companies also serve the Ojai Valley and a thorough analysis of the water service should include them, in particular those that may have problems with infrastructure or water provision. In addition, ~~while representatives from the City of Ojai and the Ojai Valley SD does not directly provide water or wastewater service to its residents, it might also~~ **should** be included in a discussion of the **water service provision to ensure that their concerns and issues can also be addressed; however, it is not suggested that either agency be included in any** possible government structure options.”*

# ERRATA SHEET & RESPONSES TO COMMENTS

## Santa Clara River Water and Wastewater Service Review Report

### City of Santa Paula Comments (those not corrected in the final report):

1. On page 14, Table 1, Santa Clara River Watershed Service Review Area Population Projections, the City staff noted:

*It would appear from the accompanying map that the service review area (watershed) includes the Areas of Interest for the water and wastewater agencies, not merely the Spheres of Influence.*

The table is based on the Ventura Regional Council of Government's (VCOG) population estimates for growth and non-growth areas and would include Areas of Interest.

2. On page 25, Exhibit 5, 2001-2002 Agency CIP Comparison, the City staff noted:

*Please double-check the accuracy of that figure. If that figure turns out to be correct, then some sort of explanation (footnote) may be appropriate since that would likely be an unusually high annual expenditure of capital funds.*

This is the figure reported by the City of Santa Paula in the database report (see Appendix A). The figure was verified by checking the City's webpage which noted that a carry-over CIP for the water fund of \$3.2 million. While it was assumed that this was for a long-term, capital improvement projects, calls to the City Finance Department staff were not returned. In the absence of additional information, the information was left as originally reported by the City of Santa Paula staff.

3. On page 26, Exhibit 6, 2001-2002 Agency Reserve Comparisons, the City staff noted:

*Presentation of reserves as absolute dollar amounts may mean very little; a better graphic may be one which shows the reserves amount as a percentage of each agency's annual budget. That way each agency is being measured on a uniform scale, and direct comparisons can be made.*

Agencies were asked to provide the total reserves as a percentage of total revenues in as part of the response to the database report. The percentages reported by the agencies were:

★ City of Fillmore	no response
★ City of Oxnard	no response
★ City of Port Hueneme	no response
★ City of Santa Paula	5%
★ Channel Islands Beach CSD	87%



★ Fox Canyon GMA	15%
★ Ocean View MWD	72%
★ United Water CD	85%
★ CSA #30	50%
★ Waterworks #16	73%

4. On Page 29, Table 9, Special Study Areas, the City staff asked:

*Why is the City of Santa Paula being considered for a possible SOI change (presumably because there is a discrepancy between SOI and CURB), while other cities which have SOI/CURB discrepancies are not targeted for SOI changes (see Fillmore and Oxnard)? Also, what makes Santa Paula warrant a "high" level of analysis, while other areas are low or moderate priorities?*

All cities with discrepancies between the SOI and CURB were labeled as “special study areas”; LAFCO will determine if the special study areas would change the SOI lines. The level of analysis for Santa Paula's SOI was considered high due to issues with the provision of wastewater service which were discussed in the text of the report, starting on page 40.

#### **Channel Islands Beach CSD (corrections):**

1) On page 41, Cost Avoidance Opportunities, the fourth complete paragraph should be corrected as follows:

*It is also suggested that Ventura LAFCO consider adopting a policy for “zero” sphere of influence designations and consider applying that designation to the Channel Islands CSD. There has been a considerable history of discussion about the provision of service to the communities served by the CSD. ~~In 1999-2000, the Ventura County Grand Jury reported on the Channel Island Beach CSD. The Grand Jury report contained a history of the District and a copy of the report is attached as Appendix C.~~ Generally the issues can be classified as boundary adjustments, service provision and the various governmental structure options available to the Ventura Commission.*

#### **Ocean View Municipal Water District (corrections and comments):**

1. On page 64, Determinations (Infrastructure Needs and Deficiencies), the correct determination should be:

1. That the Ocean View Municipal Water District ~~monitors groundwater in the Ojai Valley~~ **provides agricultural water to customers located along Hueneme Road.**

2. On page 64, Determinations (Local Accountability and Governance) the Ocean View MWD noted:

*The District holds one meeting per year. The public is notified. The meetings are held within the District. In the past eight years, I believe we have had one person from the public attend.*

*Our goal is to operate the District without incurring expenses that produce no apparent benefit. Scheduling meetings that produce no benefit seems to be wasteful.*

It is correct that having meetings that produce no benefit are an unnecessary expense of funds. The comment was intended to encourage the Ocean View MWD to hold a regularly scheduled meeting.

3. On page 64, Determinations (Local Accountability and Governance) the Ocean View MWD noted that providing an agency website for customers would not appear to be feasible given the size and number of customers and asked that this comment be deleted. It is suggested that even small agencies be encouraged to provide information electronically.

## EXECUTIVE SUMMARY

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The service review process for the water and wastewater agencies in Ventura County started in January of 2003 and will be completed in December of 2003 with the adoption of determinations for the 21 agencies located in the Ojai-San Buenaventura and Santa Clara service review areas. Determinations for the 15 agencies in the Calleguas Creek service review area were adopted by the Ventura LAFCO Commission in September of 2003.

The Ventura LAFCO service review process was designed to not only comply with the requirements of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 but also to produce a useful end result for Ventura LAFCO. As part of the service review process, a database was developed which contains information about each of the 36 water and wastewater agencies as well as templates for service review information for all agencies in Ventura County. The information in the database will be used for other service reviews and subsequent LAFCO studies.

In addition, the service review process verified and corrected mapping information for all water and wastewater agencies and identified specific special study areas where additional analysis may be required. This information can be used by Ventura LAFCO to develop annual work programs and to prioritize LAFCO's allocation of staff resources.

All the 36 agencies addressed by the service review reports are listed in the following table. Of those agencies, 25 provide only water and/or wastewater services, have now completed the service review process and can be scheduled for sphere of influence studies. Nineteen (19) of the 25 agencies have few or no sphere issues and it is expected that their sphere updates will proceed with a minimal level of effort on the part of the Ventura LAFCO staff. The remaining six agencies have sphere issues and may require more analysis on the part of LAFCO staff.

Eleven (11) of the 36 agencies provide more services than just water and wastewater and will require subsequent service reviews. However, the database now contains information that can be used for portions of those studies.

The law for service reviews requires LAFCO's to make determinations regarding potential governmental structure options for the agencies. Some water and wastewater agencies in Ventura County might reach greater economies of scale if they were to reorganize with another agency at some point in the future and the service review process identified eight (8) possible government structure options which are listed by letter in the following table.

Legal, economic, political and service barriers to each option were noted in the service review report. One substantial obstacle is the level of analysis required to fully address each option on the part of the LAFCO and agency staff. For example, one potential government structure option suggested included a reorganization of the five public agency water providers in the Ojai Valley area. A reorganization involving multiple agencies would require substantial effort on the part of the agencies and LAFCO staff. As an alternative, the service review report for the Ojai-San Buenaventura area suggested that Ventura LAFCO either initiate the reorganization of the agencies or refer the proposal to a committee or to request that the public agency water

providers form a reorganization committee and return to LAFCO with a report and recommendations. Reorganization committees could be used with other potential governmental structure options.

Another alternative suggested in the service review reports was that Ventura LAFCO consider adopting a policy allowing a “zero” sphere of influence designation for those agencies that eventually should reorganize with another service provider. According to the policy developed, changes in boundaries for an agency with a zero sphere of influence might be prohibited or might require more in-depth analysis than for other spheres of influence. The intent of a zero sphere of influence designation is to encourage agency staffs and boards to work with potential successor agencies prior to a formal application to LAFCO. The agencies with a suggested zero sphere of influence are also listed in the following table.

AGENCY	POSSIBLE ZERO SPHERE	POSSIBLE REORGANIZATION OPTION
<b>SERVICE REVIEW PROCESS COMPLETE</b>		
<b>MINOR SPHERE ISSUES</b>		
Camrosa WD		Option A
Hidden Valley MWD		
Lake Sherwood CSD		
Meiners Oaks CWD	X	Option B
Montalvo MID	X	Option C
Ocean View MWD	X	Option D
Ojai Basin Groundwater MA	X	Option B
Ojai Water CD	X	Option B
Pleasant Valley CWD		
Saticoy SD	X	Option C
CSA # 29		
CSA # 30		
CSA # 32		
Waterworks # 1	X	Option E
Waterworks # 16		
Waterworks # 17		
Waterworks # 19		
Ventura Regional SD		
United Water CD		Option D
<b>SPHERE ISSUES</b>		
Calleguas MWD		
Camarillo SD		Option A
Fox Canyon Groundwater MA		
Ojai Valley SD		
Triunfo SD	X	Option G

AGENCY	POSSIBLE ZERO SPHERE	POSSIBLE REORGANIZATION OPTION
Waterworks # 8		Option F
<b>SUBSEQUENT SERVICE REVIEW STUDIES REQUIRED</b>		
City of Camarillo		Option A
City of Fillmore		
City of Oxnard		Option D and H
City of Port Hueneme		Option H
City of San Buenaventura		Option C
City of Santa Paula		
City of Simi Valley		Option F
City of Thousand Oaks		
Casitas MWD	X	Option B
Channel Islands Beach CSD	X	Option H
Ventura River CWD	X	Option B

**Option A** includes the City of Camarillo, Camarillo SD and Camrosa WD. A discussion of the issues can be found in the Calleguas Creek service review report on page 47.

**Option B** includes the Casitas MWD, Meiners Oaks CWD, Ojai Groundwater MA, Ojai Water CD and Ventura River CWD. A discussion of the issues can be found in the Ojai-San Buenaventura service review report on page 39.

**Option C** includes the Montalvo MID, Saticoy SD and City of San Buenaventura. A discussion of the issues can be found in the Ojai-San Buenaventura service review report on page 42.

**Option D** includes the Ocean View MWD, United Water CD and City of Oxnard. A discussion of the issues can be found in the Santa Clara service review report on page 48.

**Option E** includes Waterworks District #1 and the City of Moorpark. A discussion of the issues can be found in the Calleguas Creek service review report on page 48.

**Option F** includes Waterworks District #8 and the City of Simi Valley. A discussion of the issues can be found in the Calleguas Creek service review report on page 48.

**Option G** includes the Triunfo SD. A discussion of the issues can be found in the Calleguas Creek service review report on page 49.

**Option H** includes the Channel Islands Beach CSD and the Cities of Port Hueneme and Oxnard. A discussion of the issues can be found in the Santa Clara service review report on page 41.

The service review process also identified areas of improvement that were beyond the scope of Ventura LAFCO's authority. Projections of population growth are critical for efficient planning for future water and wastewater service delivery and in Ventura County those projections are provided by a variety of agencies including the Department of Finance (DOF), Ventura Council of Governments (VCOG), Southern California Association of Governments (SCAG), Ventura County and the individual water and wastewater providers. While there is some coordination among the agencies in the source and methodology, the service review found fluctuations in population projections which make estimates of future service demands more difficult. In addition, population estimates for the boundaries of special districts are rarely provided by regional agencies. Agencies such as SCAG and Ventura County should be encouraged to develop standard protocols for projections as well as prepare population projections for special district boundaries and for municipalities.

It was also noted that agencies could avoid some costs by exploring the merger of separate agency Geographic Information System (GIS) systems. It was suggested that agencies

participate jointly in special GIS systems such as is being developed for watershed data in the Calleguas Creek service review area and for Ventura LAFCO boundary and sphere maps.

Another issue that is beyond the scope of LAFCO to address is the need to have a source of easily obtainable information about private/mutual water purveyors. The service review process is only applicable to public water purveyors that come under the purview of LAFCO. While the recently updated Ventura County Public Works Agency "Inventory of Public and Private Water Purveyors in Ventura County" provides valuable information regarding the full range of public and private water, comprehensive water planning in Ventura County, related to population projections and growth, could be improved with increased coordination among agencies.

Another related issue is the presence of private wells which are a significant source of water in Ventura County. Several agencies have data regarding wells within their boundaries but there is no single source of information that could be used for regional planning purposes. Planning for Ventura County's future infrastructure needs and deficiencies must include appropriate data about private water purveyors and wells.

Few areas of infrastructure deficiency among the water and wastewater agencies were noted. However, until there are more definitive plans for additional wastewater capacity, the Cities of Fillmore and Santa Paula face a significant issue of infrastructure deficiency and financing constraints.

Agencies generally had well-established budget processes and procedures that fully utilize opportunities to reduce or avoid costs. Some opportunities for future shared facilities and avoidance of costs were noted in the individual service review reports.

Similar financing opportunities and constraints were noted for all water and wastewater agencies. The cost to provide water and wastewater service will continue to increase as a result of greater demand and increased federal and state regulations. The largest single source of revenue (FY 2001-2002) for all the agencies was service charges/fees which represented approximately 85% of total revenues. The total amount of property tax received by the agencies (FY 2001-2002) was \$8.3 million. The largest category of aggregate reserve funds was designated for capital projects with amounts closely correlated to the agency's capital improvement plans. Operating and restricted debt reserves were the second and third largest categories of reserves, respectively.

Comparing rates among the diversity of agencies involved in the service review was difficult. The method of comparing rates used in the service review questionnaire did not yield useful information and the database will be revised using a standardized and equitable means of comparing water and wastewater rates.

Management efficiencies, local accountability and governance were also found to be efficient among most of the agencies. Meetings are typically held after normal working hours and are regularly scheduled and noticed. However, approximately 30% of the agencies do not maintain web sites which are effective at disseminating information, complying with environmental justice requirements and improving accountability to customers. No other significant environmental justice issues were noted.

After adoption by the Ventura LAFCO of determinations for all 36 water and wastewater providers, a final report will be prepared. The final report will consist of two separate documents. The first document will include this Executive Summary and each of the three service review reports as well as final determinations. The first document will be organized into three sections roughly corresponding to the watershed and service review boundaries. The second document will include each agency's responses to the Ventura LAFCO service review questionnaire. Both documents will be used by Ventura LAFCO to complete spheres of influence for the agencies involved.